



MAR 25 2015

Mr. Mike Perez
Pactiv LLC
2024 Norris Rd
Bakersfield, CA 93308

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-892
Project # S-1144526**

Dear Mr. Perez:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. These modifications includes clarifying the point sources to be monitored for visible emissions, correcting inaccurate equipment descriptions, deleting redundancy in equipment descriptions and permit conditions which span more than one permit when only one permit applies, and deleting visible emissions monitoring conditions on permits with no visible emissions sources.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

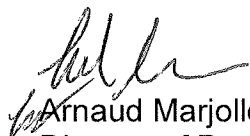
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Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arnaud Marjollet', is written over the printed name.

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Plastic Resin Molding Operations

Facility Name: Pactiv LLC	Date: March 24, 2015
Mailing Address: 2024 Norris Rd Bakersfield, CA 93308	Engineer: Stephen Leonard
	Lead Engineer: Allan Phillips <i>AP</i>
	Date: MAR 25 2015
Contact Person: Mike Perez	
Telephone: 661-392-4020	
Fax: 661-392-4060	
E-Mail: mperez01@pactiv.com	
Application #(s): S-892-2-23, '-4-30, '-5-24, '-10-24, & '-17-26	
Project #: S-1144526	
Deemed Complete: January 8, 2015	

I. Proposal

Pactiv LLC (Pactiv) operates a foam manufacturing facility, S-892, in Bakersfield. The facility produces food grade plastic packaging products. Pactiv proposes to modify five permits which involve pneumatic transfer of either raw material or scrap material to be recycled within the process. These modifications include clarifying the point sources to be monitored for visible emissions, correcting inaccurate equipment descriptions, deleting redundancy in equipment descriptions and permit conditions which span more than one permit when only one permit applies, and deleting visible emissions monitoring conditions, added without justification during the initial Title V permitting process, on permits with no visible emissions sources. See "Proposed Modifications" in Section V for particular modifications by permit unit.

There is no proposed increase in the daily or annual amount of raw materials received or processed. There is no proposed or expected increase in PM₁₀ emissions resulting from processing polystyrene and no VOC blowing agents are used in this processing line so there continues to be no VOC emissions. The administrative corrections proposed do not constitute an "NSR Modification", pursuant to Rule 2201, Section 3.25.

Pactiv received their Title V Permit on July 15, 1998. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Pactiv must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter Emission Rate (12/17/92)
Rule 4682	Polystyrene foam, Polyethylene, and Polypropylene Manufacturing (9/20/07)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

III. Project Location

The facility is located at 2024 Norris Rd in Bakersfield, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Pactiv operates this manufacturing facility that produces food grade plastic products using polyethylene molding, polypropylene molding, and polystyrene foam thermoforming. The polystyrene foam products are produced with polystyrene resins and an iso-pentane VOC blowing agent mixed with CO₂ and methyl formate as non-VOC co-blowing agents.

Permit unit S-892-2 is for a virgin resin (not reclaimed resin) transfer operation, which moves the virgin resin from the storage silos to the extruders. Two blowers utilizing a pull/push process (similar to all transfer processes) are currently used to transfer virgin resin from the five virgin resin storage silos to the eight virgin resin use bins. The "pull" blower exhausts after being filtered through a filter/receiver and the "push" blower exhausts through the bin vent of each virgin resin use bin.

Permit unit S-892-4 is the polystyrene fluff and scrap material reclaim operation where trim scrap coming off the thermoformers, startup scrap, and off spec material sheets are run through grinders and granulators to reduce the size and allow pneumatic transfer of ground scrap to reclaim storage silos which are vented to the thermal oxidizer. Ground scrap and fluff foam is processed through reclaim extruders which melts scrap polystyrene and sheet fluff, then

extrudes strands of plastic which are cut by an underwater high speed rotating knife to form pellets, which are then transported to reclaim storage bins. The reclaim extruders are fully enclosed and any released pentane is vented directly to the thermal oxidizer.

Permit unit S-892-5 is for a reclaimed resin transfer operation, which moves the reclaimed resin from storage to the extruders. Currently two blowers utilizing a pull/push process (similar to all transfer processes) are used to transfer reprocessed polystyrene pellets from the ten reclaim resin storage silos to the reclaim resin use bins. The "pull" blower exhausts after being filtered through a filter/receiver and the "push" blower exhausts through the bin vent of each reclaim resin use bin.

Permit unit S-892-10 is for the polystyrene foam extrusion process consisting of 10 foam extrusion lines. Virgin polystyrene pellets, reclaimed polystyrene pellets, and other inert additives are fed through hoppers (resin use bins) into the primary extruder. The primary extruder is heated to approximately 450 °F to melt the pellets and to dissolve the blowing agent, which has been injected into the molten polystyrene prior to exiting the die. The polystyrene expands because the blowing agent vaporizes and creates air spaces in the polystyrene as it leaves the die. The combined materials are then extruded into the secondary extruder. A screen between the primary and secondary extruders removes impurities in the foam. In the secondary extruder, the materials are cooled in a direct contact water bath and extruded vertically upwards over a mandrel to form a foam tube. The polystyrene foam exits the die at approximately 350 °F. The tube is slit lengthwise to form sheets which are drawn upwards vertically approximately 20 feet to rollers which then allow the sheets to be angled downward towards the rolling machine where the sheets are wound into 6-foot diameter rolls. These rolls are stored and cured in the outside storage area for 2 to 3 days to allow for proper setup, or formation of the cells in the foam material. The resin use bins are vented to fabric filter collectors (baghouse). The exhaust from the baghouse is ducted to the RTO. The vertical mandrel extrusion is not a controllable fugitive VOC source due to its vertical orientation to accommodate the water cooling, height of vertical travel for extruded sheets and equipment footprint. This process is totally enclosed and pressurized for the most part and has no sources of visible emissions.

Permit unit S-892-17 is for the thermoforming operation with 17 thermoforming lines including thermoformers, heat tunnels and trim presses. After curing, the foam sheet is processed on a thermoforming line. Here, the sheet is heated and molded into the desired shape. The molded sheet is then trimmed into the finished products and packaged. Various types of packaging are used for storage and transport of the finished goods to the customer. Directly below the trim die is a scrap collection point which is under a negative pressure via a vacuum blower. Scrap foam and fugitive VOC's are drawn into the scrap collection permit where scrap foam is pneumatically transferred to the scrap collection and processing area. Scrap grinders and storage silos are served by baghouses with the exhaust ducted to the RTO. The scrap collection and grinding operations are enclosed and under negative pressure for the most part and has no sources of visible emissions.

V. Equipment Listing

Pre-Project Equipment Descriptions:

- S-892-2-22: VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
- S-892-4-29: POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
- S-892-5-23: RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
- S-892-10-31: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES
- S-892-17-24: THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

Proposed Modifications:

- S-892-2-23: MODIFICATION OF VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510): CLARIFY POINT SOURCE FOR VISIBLE EMISSIONS MONITORING AT VACUUM BLOWER EXHAUST
- S-892-4-30: MODIFICATION OF POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, THREE RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO): REMOVE "RECLAIMED RESIN STORAGE AND TRANSFER" FROM EQUIPMENT DESCRIPTION, REMOVE REFERENCE TO VISIBLE EMISSIONS MONITORING AT SILOS FROM PERMIT CONDITIONS

- S-892-5-24: MODIFICATION OF RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510): CORRECT MATERIALS STORED IN SILOS AS "RECLAIMED POLYSTYRENE PELLET (RPP)", CORRECT NUMBER OF RPP SILOS FROM 11 TO 10, CLARIFY THAT VISIBLE EMISSIONS BE READ AT VACUUM BLOWER EXHAUST
- S-892-10-34: MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: REMOVE REFERENCE TO VISIBLE EMISSIONS MONITORING IN PERMIT CONDITIONS
- S-892-17-26: MODIFICATION OF THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES: REMOVE REFERENCE TO VISIBLE EMISSIONS MONITORING IN PERMIT CONDITIONS

Post Project Equipment Descriptions:

- S-892-2-23: VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
- S-892-4-30: POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, THREE RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
- S-892-5-24: RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
- S-892-10-34: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES
- S-892-17-26: THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

VI. Emission Control Technology Evaluation

These administrative modifications do not qualify as a Rule 2201 modification; therefore a review of emission control technology is not required.

VII. General Calculations

These administrative modifications do not qualify as a Rule 2201 modification; therefore calculations for PE, SSPE, SB 288 major modification, Federal Major Modification, and public notice are not required.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

These administrative modifications do not qualify as a Rule 2201 modification; therefore this rule does not apply and no further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an Administrative Amendment prior to operating with the proposed modifications. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application. Continued compliance with this rule is expected.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to polypropylene and polyethylene resin unloading, storage, transfer operations and scrap grinding operations.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to polypropylene and polyethylene resin unloading, storage, transfer operations and scrap grinding operations.

Rule 4101 Visible Emissions

As long as the equipment is properly maintained and operated, the emission units shall not discharge, into the atmosphere, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark, or darker, in shade as that designated as No. 1 on the Ringelmann Chart or equivalent to 20% opacity.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of this operation provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

There are no increases in HAPs associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Rule 4201 requires that particulate matter emissions shall not exceed 0.1 grain per cubic foot of gas at dry standard condition.

All permit units involved with this project are currently in compliance with Rule 4201 and are expected to remain in compliance as a result of these administrative changes.

Rule 4202 Particulate Matter - Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates.

$$E = 3.59 \times P^{0.62} \text{ if } P \leq 30 \text{ tons/hr}$$
$$E = 17.31 \times P^{0.16} \text{ if } P > 30 \text{ tons/hr}$$

Where,

E = emissions in lb/hr

P = process weight rate in tons/hr

All permit units involved with this project are currently in compliance with Rule 4202 and are expected to remain in compliance as a result of these administrative changes.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project. The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-892-2-23, '4-30, '5-24, '10-34, and '17-26 subject to the permit conditions on the attached draft ATCs in Appendix C.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-892-2-23	3020-1-C	70 electric motor horsepower	\$197.00
S-892-4-30	3020-2-H	16.0 MMBtu/hr	\$1,030.00
S-892-5-24	3020-1-C	60 electric motor horsepower	\$197.00
S-892-10-34	3020-1-H	1,600 electric motor horsepower	\$1,030.00
S-892-17-26	3020-1-H	1,600 electric motor horsepower	\$1,030.00

Appendixes

- A: Current PTOs
- B: Emissions Profile
- C: Draft ATCs

APPENDIX A

Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-2-22

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm virgin resin. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
8. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-4-29

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

PERMIT UNIT REQUIREMENTS

1. Storage silos shall be gas tight with no visible emissions in excess of 5% opacity (Ringelmann 1/4) from the storage silos. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The VOC vapor collection system shall serve 3 fluff feed silo fabric collector exhausts, 3 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
5. Operation shall include no more than 3 reclaim extruder lines with underwater pelletizer systems, air driers, and 3 pelletizer blowers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District Rule 2201] Federally Enforceable Through Title V Permit
7. RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
8. RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District Rule 2201] Federally Enforceable Through Title V Permit
10. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas flowrate to RTO burners shall not exceed 16,000 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
13. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682] Federally Enforceable Through Title V Permit
15. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682] Federally Enforceable Through Title V Permit
16. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682] Federally Enforceable Through Title V Permit
18. Records required by conditions on this permit shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum emission rate of SOx (as SO2) shall not exceed 0.01 pound per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 7.69 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Maximum emission rate of oxides of nitrogen (NOx) shall not exceed 2.24 pounds per hour (as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit
23. Maximum emission rate of carbon monoxide (CO) shall not exceed 0.56 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District Rule 2201 and District Rule 1081] Federally Enforceable Through Title V Permit
25. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a EPA Method 9 test to determine whether emissions are in excess of Ringelmann 1 or 20% opacity. Upon detection of visible emissions greater than Ringelmann 1 or 20% opacity, District-witnessed source testing by independent testing laboratory shall be conducted to verify compliance with PM, NOx, and CO emission limits. [District Rule 2201 and District Rule 1081] Federally Enforceable Through Title V Permit
26. Results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682] Federally Enforceable Through Title V Permit
28. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4682. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
29. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520] Federally Enforceable Through Title V Permit
30. Records of control system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 4201, section 3.0 (12/17/92) and 4682, sections 5.1 and 5.2 (6/16/94). [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-5-23

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm RPP. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 2201; and 1081, 5.0] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0; and Kern County Rule 404] Federally Enforceable Through Title V Permit
9. Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as bughouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-10-31

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \times \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
20. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
22. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Average daily amount of material input to extruders shall be calculated as follows: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month})/(\text{total hours of operation in month}))$. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-17-24

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

PERMIT UNIT REQUIREMENTS

1. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. At the end of each calendar month, the permittee shall record the following information for that calendar month: pounds of VOC blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. Such records shall be made readily available for District inspection upon request. [District Rule 2201, 1070 and 4682] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
7. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rule 2201 and 1081] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

APPENDIX B

Emissions Profiles

Permit #: S-892-2-23	Last Updated
Facility: PACTIV LLC	03/24/2015 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-4-30	Last Updated
Facility: PACTIV LLC	03/24/2015 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	19637.0	73.0	5329.0	4891.0	67379.0
Daily Emis. Limit (lb/Day)	53.8	0.2	14.6	13.4	184.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-5-24	Last Updated
Facility: PACTIV LLC	03/24/2015 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	3176.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	8.7	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-10-34	Last Updated
Facility: PACTIV LLC	03/24/2015 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	450334.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1233.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-17-26	Last Updated
Facility: PACTIV LLC	03/24/2015 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX C

Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-2-23

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510): CLARIFY POINT SOURCE FOR VISIBLE EMISSIONS MONITORING AT VACUUM BLOWER EXHAUST

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm virgin resin. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services

S-892-2-23 : Mar 24 2015 2:47PM -- LEONARDS : Joint Inspection NOT Required

6. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
9. Visible emissions from the 30 hp vacuum transfer blower exhaust shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-4-30

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, THREE RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO); REMOVE "RECLAIMED RESIN STORAGE AND TRANSFER" FROM EQUIPMENT DESCRIPTION, REMOVE REFERENCE TO VISIBLE EMISSIONS MONITORING AT SILOS FROM PERMIT CONDITIONS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Storage silos shall be maintained gas tight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services

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6. The VOC vapor collection system shall serve 3 fluff feed silo fabric collector exhausts, 3 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
7. Operation shall include no more than 3 reclaim extruder lines with underwater pelletizer systems, air driers, and 3 pelletizer blowers. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District Rule 2201] Federally Enforceable Through Title V Permit
9. RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
10. RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District Rule 2201] Federally Enforceable Through Title V Permit
12. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fuel gas flowrate to RTO burners shall not exceed 16,000 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
15. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682] Federally Enforceable Through Title V Permit
16. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682] Federally Enforceable Through Title V Permit
17. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682] Federally Enforceable Through Title V Permit
18. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
19. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682] Federally Enforceable Through Title V Permit
20. Records required by conditions on this permit shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Maximum emission rate of SOx (as SO2) shall not exceed 0.01 pound per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 7.69 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Maximum emission rate of oxides of nitrogen (NOx) shall not exceed 2.24 pounds per hour (as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit
25. Maximum emission rate of carbon monoxide (CO) shall not exceed 0.56 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District Rule 2201 and District Rule 1081] Federally Enforceable Through Title V Permit
27. Results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682] Federally Enforceable Through Title V Permit
29. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4682. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
30. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520] Federally Enforceable Through Title V Permit
31. Records of control system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 4201, section 3.0 (12/17/92) and 4682, sections 5.1 and 5.2 (6/16/94). [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-5-24

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510): CORRECT MATERIALS STORED IN SILOS AS "RECLAIMED POLYSTYRENE PELLET (RPP)", CORRECT NUMBER OF RPP SILOS FROM 11 TO 10, CLARIFY THAT VISIBLE EMISSIONS BE READ AT VACUUM BLOWER EXHAUST

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm RPP. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services

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6. Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Visible emissions from the 30 hp vacuum transfer blower exhaust shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0; and Kern County Rule 404] Federally Enforceable Through Title V Permit
11. Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as bughouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-10-34

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
REMOVE REFERENCE TO VISIBLE EMISSIONS MONITORING IN PERMIT CONDITIONS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO2 by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services

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7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \times \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
19. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Average daily amount of material input to extruders shall be calculated as follows: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month}) / (\text{total hours of operation in month}))$. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-17-26

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING
THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES: REMOVE REFERENCE TO VISIBLE EMISSIONS
MONITORING IN PERMIT CONDITIONS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services
S-892-17-26 : Mar 24 2015 2:47PM -- LEONARDS : Joint Inspection NOT Required

5. At the end of each calendar month, the permittee shall record the following information for that calendar month: pounds of VOC blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. Such records shall be made readily available for District inspection upon request. [District Rule 2201, 1070 and 4682] Federally Enforceable Through Title V Permit
6. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
8. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
9. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}] / \text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

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